

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LIGHTHOUSE FINANCIAL GROUP,	x	11 Civ. 398 (GBD)
Individually and on Behalf of All Others	:	
Similarly Situated,	:	
	:	ECF Case
Plaintiff,	:	
	:	Oral Argument Requested
vs.	:	
	:	
THE ROYAL BANK OF SCOTLAND	:	
GROUP, PLC, et al.,	:	
	:	
Defendants.	:	
	:	
	x	

**JOINDER OF PETER DENIS SUTHERLAND IN THE ROYAL BANK OF SCOTLAND
GROUP PLC’S AND THE INDIVIDUAL DEFENDANTS’ MOTIONS TO DISMISS
THE CONSOLIDATED AMENDED COMPLAINT**

Peter Denis Sutherland hereby joins and incorporates by reference the motions to dismiss and accompanying opening and reply memoranda of law and declarations in support thereof filed by The Royal Bank of Scotland Group plc (“RBS”) the Individual Defendants on January 13, 2012 and April 12, 2012. [Dkt. Nos. 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 108, 109, 110, 111, 112, 113, 114.] The November 1, 2011 Consolidated Amended Complaint (“CAC”) [Dkt. No. 71] names Sutherland as a defendant for alleged violations of Section 11 of the Securities Act of 1933, 15 U.S.C. §§ 77(a)(2) & 77k.¹

¹ Mr. Sutherland is of the view that he has not been heretofore properly served with a summons and complaint and thereby made a defendant in this action. The parties have conferred, however, and have agreed that the undersigned counsel for Mr. Sutherland shall accept service on his behalf and that he shall be deemed properly served as of June 7, 2012, the date of this Joinder.

For the reasons set forth in RBS's and the Individual Defendants' motions to dismiss and accompanying opening and reply memoranda of law and declarations in support thereof, the claims against Sutherland should be dismissed with prejudice.

Dated: June 7, 2012

Respectfully submitted,

/s/ David S. Lesser

David S. Lesser
Robert W. Trenchard
WILMER CUTLER PICKERING
HALE AND DORR LLP
399 Park Avenue
New York, New York 10022
Telephone: 212-230-8800
Fax: 212-230-8888

Andrea J. Robinson
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Telephone: 617-526-6000
Fax: 617-526-5000

*Counsel for defendant Peter Denis
Sutherland*